

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

TERRELL D. GARRETT  
and ROBIN L. GARRETT,  
Debtors.

Case No. 15-01715-JMC-13

**DEBTORS' OBJECTION TO PROOF OF CLAIM AND  
NOTICE OF RESPONSE DEADLINE**

TO: Springleaf Financial Services of Indiana, Inc.

Pursuant to F.R.B.P. 3007, the undersigned respectfully objects to the Proof of Claim filed in the above-entitled case by Springleaf Financial Services of Indiana, Inc., which is claim number (4) on the Claims Register maintained by the Clerk of the Court. The grounds for this objection are as follows:

1. The collateral alleged to secure the loan to Debtors is of a non-purchase money security nature.
2. The Creditor has grossly overvalued the "value of property" in asserting the amount of secured claim.
3. The Creditor seeks interest that is contrary to *Till v. SCS Credit Corp.*, 541 U.S. 465, 124 S.Ct. 1951, 158 L.Ed.2d 787 (2004) and 11 U.S.C. § § 1129, 1173, 1225, and 1228.

**NOTICE IS GIVEN** that any response must be filed with the Bankruptcy Clerk within 30 days from date of service [or such other time period as may be permitted by Fed.R.Bankr.P. 9006(f)]. Those not required or not permitted to file electronically must deliver any response by U.S. mail, courier, overnight/express mail, or in person at:

United States Bankruptcy Clerk  
116 U.S. Courthouse  
46 East Ohio St  
Indianapolis, IN 46204

The responding party must ensure delivery of the response to the party filing the objection. If a response is NOT timely filed, the requested relief may be granted. If a response is filed, a hearing will be set at a later date, and all parties will receive a notice of that hearing.

WHEREFORE, the Debtors move the Court for an order disallowing the aforementioned claim as submitted.

/s/ TERRELL D. GARRETT

Terrell G. Garrett

Dated: April 2, 2015

/s/ ROBIN L. GARRETT

Robin L. Garrett

/s/Chad D. Wuertz

Chad D. Wuertz, #26656-49

Attorney for Debtor(s)

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**CERTIFICATE OF SERVICE**

I certify a true and correct copy of the foregoing Objection to Proof of Claim was served via either U.S. Mail, postage paid, or ELECTRONICALLY on the Office of NANCY GARGULA, U.S. Trustee, 101 W. Ohio Street, Indianapolis, IN. 46204; Chapter 13 Trustee; Springleaf Financial Services of Indiana, Inc. (either electronically on this creditor or by U.S. mail, postage prepaid), this **2<sup>nd</sup> day of April, 2015.**

/s/Chad D. Wuertz

Chad D. Wuertz

Attorney for Debtor(s)